

REMARKS

This Response is submitted in reply to the Office Action dated March 7, 2005. Claims 1 to 37 are pending in the patent application. Claims 27 to 30 and 35 to 37 have been withdrawn. None of the claims have been amended. A Supplemental Information Disclosure Statement is submitted herewith. A check in the amount of \$180 is submitted herewith to cover the cost of the Supplemental Information Disclosure Statement. Please charge Deposit Account No. 02-1818 for any insufficiency of payment.

In the Office Action, the drawings were objected to under 37 C.F.R. §1.83(a). The specification was objected to based on informalities. Claims 1, 2, 4 to 7, 15, 17 to 19, 21 and 26 were rejected under 35 U.S.C. §102(b). Claims 3, 8 to 14, 20, 22 to 25 and 33 were rejected under 35 U.S.C. §103(a). Applicant respectfully submits that the rejections in the Office Action have been overcome or are improper for the reasons discussed below. Applicant therefore requests that the patentability of Claims 1 to 26 and 31 to 34 be reconsidered.

The drawings were objected to under 37 C.F.R. §1.83(a). Specifically, the Office Action states that the part measurer 117 described in the specification on page 10 is not shown in the drawings. Applicant respectfully submits that part measurer 117 is shown in Fig. 9. Accordingly, Applicant respectfully requests that the objection to the drawings be withdrawn.

The specification was objected to based on informalities. Specifically, the Office Action states that the "Cross References to Related Applications" section should be updated to include the filing dates and any patent numbers associated with the applications listed in this section. Applicant has amended the "Cross References to Related Applications" section to include the filing dates of the listed applications and any patent numbers associated with these applications.

The Office Action states that Figs. 3C, 16A and 16B are not referred to in the specification. Applicant has amended the specification to include the descriptions of Figs. 3C, 16A and 16B. No new matter has been added by the amendments made herein.

Claims 1, 2, 4 to 7, 15, 17 to 19, 21 and 26 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,169,605 to Penn et al. ("*Penn*"). Applicant respectfully disagrees with and traverses this rejection for at least the following reasons.

Penn does not disclose, teach or suggest the elements of Claim 1. Specifically, *Penn* does not disclose, teach or suggest utilizing a measuring means positioned adjacent to a support means for measuring a section of a part where the measuring means measures a dimension of the section of the part being coated while a coating means continues to apply an amount of coating to the section of the part based on the measurements.

Penn is directed to a method and apparatus for the computer-controlled manufacture or modeling of three dimensional objects from computer data. The apparatus obtains data related to a physical object, stores the data as a file in a CAD system, and then utilizes the data stored in the CAD system to control print devices to generate a three-dimensional copy, prototype or model of the physical object.

More specifically, *Penn* states that an image capture device, such as a CAD system, scans and captures an image of a three-dimensional physical object. (Col. 10, lines 10-14). The CAD system is used to "generate and store specific data, including dimensions, color, or other desired properties" of the physical object. (Col. 9, lines 57-59)(Emphasis Added). This data is sent to and stored by a microprocessor control system 90 which contains "microprocessor instructions, as well as image processing and data conversion code to process the input data into sequential cross-sections of the three-dimensional object to be physically rendered." (Col. 9, lines 57 to 65). The microprocessor uses the stored data to control positioning devices 45 and a printhead 20 to generate a replica of the three-dimensional physical object. Specifically, the microprocessor controls the movement of positioning devices 45 and causes the positioning devices 45 to move the printhead 20 and/or target surface 50 to predetermined locations. (Col. 9, line 66 to Col. 10, line 9). The instructions also cause print devices 10 within printhead 20 to dispense layers of liquid materials 25, 35 onto

the target surface 50 at the predetermined locations to generate the three-dimensional object. (Col. 9, line 66 to Col. 10, line 5).

The data and measurements in *Penn* are therefore taken before (and not while) the three-dimensional model is being created or modified. Accordingly, *Penn* does not disclose, teach or suggest taking any measurements of a part being coated while applying a coating to a section of the part based on the measurements taken by a measuring means as defined by Claim 1.

For at least these reasons, *Penn* does not disclose, teach or suggest the elements of Claim 1. Therefore, Claim 1 and Claims 2 to 16, which depend from Claim 1, are each patentably distinguished over *Penn* and are in condition for allowance.

Claims 17 and 31 include certain similar elements to Claim 1. Accordingly, Claims 17 and 31 and Claims 18 to 26 and 32 to 34, which depend from Claims 17 and 31, respectively, are each patentably distinguished over *Penn* and in condition for allowance.

Claim 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Penn* in view of U.S. Patent No. 5,959,731 to Jones ("*Jones*"). Claim 3 depends from Claim 1. Therefore, Claim 3 is allowable for at least the reasons provided above with respect to Claim 1 because the combination of *Penn* and *Jones* does not disclose, teach, or suggest the novel elements of Claim 3 in combination with the novel elements of Claim 1.

Claims 8 to 14, 20, 22 to 25 and 33 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Penn* in view of *Keyence* ("*Keyence*") (high speed laser scan micrometer). Claims 8 to 14 depend from Claim 1. Claims 20 and 22 to 25 depend from Claim 17 and Claim 33 depend from Claim 31. Therefore Applicant respectfully submits Claims 8 to 14, 20, 22 to 25 and 33 are allowable for at least the reasons set forth above with respect to independent Claims 1, 17 and 31 because the combination of *Penn* and *Keyence* does not disclose, teach or suggest the novel elements of Claims 8 to 14, 20, 22 to 25 and 33 in combination of the novel elements of independent Claims 1, 17 and 31, respectively.

An earnest endeavor has been made to place this application in condition for allowance, and such allowance is courteously solicited. If the Examiner has any questions related to this Response, Applicant respectfully requests that the Examiner contact the undersigned.

Respectfully submitted,

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